

THORPE A. WADDINGHAM
ATTORNEY AT LAW
DELTA, UTAH 84624

March 10, 1975

Mr. Dee C. Hansen
Utah State Engineer
442 State Capitol Building
Salt Lake City, UT 84114

Dear Mr. Hansen:

Reference is made to your telephone conversation of approximately one month ago. The substance of such conversation was that you intended to hold hearings on problems involving the administrative procedures used by the two River Commissioners in administering the Sevier River, and more particularly, those areas where Commissioner Bruce Whited and Commissioner Roger Walker are interpreting the Cox Decree different. It was my understanding that any interested users on the Sevier River system could submit to your office specific problems of the type referred to and that you would schedule hearings at which all interested parties would have an opportunity to present their views and ask questions of either of the Commissioners or any other persons offering testimony during such hearings. It is further my understanding that following such hearings you would make a determination and issue an Order in a form which would be appealable to the District Court by any party within a 60 day period following the entry of such Order.

In accordance with such understanding, I am taking this opportunity to submit the first of a number of administrative problems which have come to the attention of my clients, and ask that you notify all interested parties and schedule a date for a hearing. The problem referred to involves what is referred to as the "A-L Agreement". Your attention is directed to pages 10-13 of the Annual Report Sevier River Water Distribution for the year 1968; said pages purporting to be a copy of such Stipulation. Pages 14-17 of said 1968 report set forth a "Explanation of 1968 Regulating Stream" prepared by Commissioner Bruce Whited and Roger Walker. Pages 14-17, from the viewpoint of my clients, appears to be substantially accurate excepting that the second paragraph on page 14 is not in accordance with the Stipulation. The paragraph numbered 2 of the Stipulation specifies that the regulatory stream should be calculated by averaging the average flow of any consecutive seven days. It is my understanding that the records of the Commissioners will show that the language in paragraph numbered 2 of the Stipulation has been followed rather than the paragraph numbered 2 of and appearing at page 14. It is further my understanding that as the result of a request made by then Commissioner, Keith Christensen, verbally concurred in by all interested parties, that the day before flows at Piute were used to correspond with the day flows of Vermillion Dam and that such procedure has a practical matter been used by the Commissioners in making the regulating stream computation.

Mr. Dee C. Hansen
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*recommend
keep it*

Parenthetically, I note that my files do not indicate that the Stipulation appearing in the 1968 Decree was in fact executed by all parties. I am this date contacting other attorneys that were involved in the litigation to determine whether or not my files are accurate and if they are, to take whatever steps are necessary to finalize the Stipulation.

Reference is also made to the 1971 Sevier River Annual Report and more particularly pages 7-a, 7-b and 7-c thereof. The pages referred to represent a complete breakdown of how the regulating stream was computed for the water year 1970-71. My first impression is that the procedure and calculations set forth therein is in accordance with the understanding of my clients.

The following elementary schedule of matters need to be established:

1. That Piute Reservoir and Irrigation Company, Monroe Southbend Canal Company and Vermillion Irrigation Company are NOT parties to the Stipulation nor are they listed in the Decree as A-L users.

*stand
loss*

2. That Monroe Southbend Canal Company and Vermillion Irrigation Company do not have any storage right during any period of the year in either Piute Reservoir or Sevier Bridge Reservoir. However, Monroe Southbend Canal Company and Vermillion Irrigation Company have a year-round diversion right whereas the A-L companies with minor exceptions, do not have a right to divert water in the winter. This difference in the matter of the rights is accounted for by the fact that the A-L companies gave up practically all of their rights of irrigating during the winter months in exchange for the storage in Piute Reservoir. In effect, Monroe Southbend and Vermillion have a "Use or Lose" right, and whenever water to which they were otherwise entitled during any period of the year is not diverted and used by them, it becomes available for allocation either for storage or to other primary rights.

*lose non-
use
no A-L reg.
stream.*

3. That without the A-L Agreement water available for use by the parties named in the Stipulation, either because of releases ordered by Piute or by reason of water being made below Piute which was not used and allowed to go over Vermillion Dam, was allocated to storage waters. The River Commissioners found it difficult to administer the water below Piute on a daily basis and made it known that if a limited regulated stream could be allowed, credit for which would be given back to the parties to the Stipulation, that they could do a better and more complete job of administering waters below Piute Reservoir and Vermillion Dam. This was the purpose of the so-called A-L Stipulation.

I have discussed this matter with Commissioner, Roger Walker. It is my belief that his understanding of the procedure to be used in allocating water pursuant to the Decree in the A-L Agreement, are basically as previously outlined in this letter. It is my further understanding that the water rights referred to have been computed and credits given in accordance with the procedures referred to in this letter and in the two River Reports referred to. However, it is apparent that Commissioner Bruce Whited does not place the same interpretation on the water rights and documents referred to. I am enclosing herewith, a sheet designated "Water Summary as of October 1, 1974" identified by roman numeral I. The following observations were made with regards to such enclosure:

(a) Monroe Southbend Canal Company and Vermillion Irrigation Company are included in the list of A-L Companies as hereinbefore pointed out. They are neither parties to the Stipulation nor are they identified as parties in the Decree.

(b) The column headed "Approx. A-L Reg Credit" shows the A-L credited after deductions for hold over reservoir loss of the 5911 acre feet, whereas under the heading "Reservoir Summary" Sevier Bridge A-L Reg Stream Est. is 7085 acre feet. It should be obvious that some explanation is necessary to account for the difference in the two figures given in the regulating stream on the same report. One obvious answer seems to be that different figures were necessary in the Reservoir Summary to make the books balance. If this be the reason for the difference in the figures, it would be clearly improper.

(c) That the computation allows credit for the regulating stream to be given in Otter Creek Reservoir. This is contrary to the proposed Stipulation which allows credit to be given back into Piute Reservoir only. If this practice has been practiced in prior years, neither myself or any of my clients were advised of such fact. The detailed breakdown is not available from a reading of the annual reports and such detailed information has not been made available to either myself or the companies that I represent, on a regular annual basis.

*release
Otter Creek
into Piute
at time of
exchange*

(d) The reservoir summary indicates a total physical storage in both Piute Reservoir and Otter Creek Reservoir of 23,450 acre feet whereas the total holdover credits to be honored after deduction of winter losses is 26,722 acre feet. The only way that the difference between water available and computed credits, i.e. 3272 acre feet can be honored is to deduct such amount from new storage made during the water season BEFORE allocating the storage made during the winter season to those entitled thereto. The amount of the new storage available would be deducted from waters which would otherwise be distributed to Sevier Bridge Reservoir and/or Piute Reservoir. If there is any other way of making up the deficit, it is requested that whoever can point such other way out, do so.

(e) It is my understanding that the winter loss on water held in Piute Reservoir is 5%. From a reading of enclosed sheet one, it is apparent that the winter loss in Otter Creek Reservoir is computed at 25%. It is my understanding that the 25% figure is one determined annually by the Board of Directors of the Otter Creek Storage Company.

Co. policy

In as much as the physical water for which the Piute Company has credit for is not in Piute Reservoir, it becomes difficult to determine how Mr. Whited determined the Piute holdover loss as being 831 acre feet. I have tried a number of computations. First was the water credited to Piute as a basis for the 5% loss and the balance a Otter Creek loss and then using the physical water in Piute as a basis and the balance as a loss in Otter Creek. Neither computation appears to result in getting close to the 831 acre feet holdover loss computed by Mr. Whited. It is requested in advance of any hearing, that Mr. Whited furnish us with a copy of the computation which is followed when arriving at the loss figure referred to. A copy of this letter is being sent to Mr. Whited so that he will be fully advised and so that he can, if he proposes to do so, make a response to your office with a copy of same to me without

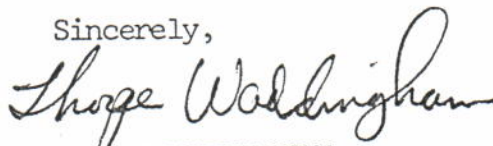
Mr. Dee C. Hansen
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waiting for a direct request from you.

I am attempting to isolate the various administrative problems by setting forth the questions and the position of my clients in a series of separate communications. This is but the first of such communications. However, it does appear to me that the problem of computing the regulating stream and the allocation of reservoir credits is of sufficient importance to merit the holding of a separate hearing on such subject.

I would appreciate your advising me whether or not my understanding of my discussion covers all of the procedures to be followed is correct and if not, instruct me further as to what procedure you desire me to follow in implementing the hearing procedures.

Sincerely,


THORPE WADDINGHAM

TW:dw

Enc.

P.S. For your convenience, I have reproduced and enclosed copies of the pages in the 1968-71 Sevier River Reports which have been referred to in this letter.

cc: Mr. Bruce Whited

STATE OF UTAH
DIVISION OF WATER RIGHTS

Daily Discharge in Second Feet of - REGULATING STREAM - 1971 -
APRIL MAY

Day	Piute	Verm. Dam	15% Piute	Verm. Dam	Reg.	Storage	Piute	Verm. Dam	15% Piute	Verm. Dam	Reg.	Storage
1	4	60				60	393	9				
2	4	51				51	415	16				
3	4	42				42	326	28				
4	4	17				17	370	2				2
5	4	13				13	540	3				3
6	4	0					573	34				
7	4						508	32				
8	4						530	10				
9	4						566	9				
10	4						532	16				
11	4						487	9				
12	4						469	13				
13	40	0					458	13				
14	172	27					471	16				
15	80	6					511	20				
16	203	5					460	6				
17	254	43					455	17				
18	252	57					421	39				
19	250	45					399	33				
20	239	45					323	13				
21	162	20					322	8				
22	138	20					282	14				
23	158	20	218	250	218	32	266	21				
24	253	22					248	18				
25	227	15					245	5				
26	269	8					257	5				
27	310	3					258	8				
28	394	11					258	13				
29	394	17					279	16				
30	394	22					274	18				
31							280	22				
Total		569				215		486				5
Agt. Ft.		1129			703	426		964			954	10

STATE OF UTAH
DIVISION OF WATER RIGHTS
Daily Discharge in Second Feet of - REGULATING STREAM - 1971 -

JUNE							JULY					
Day	Piute	Verm. Dam	15% Piute	Verm. Dam	Reg.	Storage	Piute	Verm. Dam	15% Piute	Verm. Dam	Reg.	Storage
1	280	26					540	1				1
2	280	11					575	5				
3	277	2				2	580	11				
4	326	3				3	576	4				
5	378	7					571	7				
6	386	25					566	11				
7	394	29					561	9				
8	394	25					558	7				
9	394	39					556	6				
10	361	26					548	3				
11	288	5					544	1				1
12	305	44					542	1				1
13	217	24					539	1				1
14	163	16					535	1				1
15	146	25					532	2				2
16	146	49					530	9				
17	133	23					527	11				
18	148	19					521	40				
19	146	35					519	55				
20	117	25					521	86				
21	78	30	137	206	137	69	476	114				
22	74	24					452	113				
23	75	6					372	67				
24	139	4					307	50				
25	208	15					305	75				
26	209	8					295	56	409	561	409	152
27	327	4					246	16				
28	382	3				3	306	27				
29	386	2				2	304	20				
30	489	2				2	314	20				
31							322	30				
Total		556				81		859				159
Total ac. ft.		1103			942	161		1704			1399	315

STATE OF UTAH
DIVISION OF WATER RIGHTS

Daily Discharge in Second Feet of _____ - REGULATING STREAM - 1971 -
AUGUST SEPTEMBER

Day	Piute	Verm. Dam	15% Piute	Verm. Dam	Reg.	Stor- age	Piute	Verm. Dam	15% Piute	Verm. Dam	Reg.	Stor- age
1	298	51					218	22				
2	287	58					183	18				
3	246	38					185	21				
4	291	23					190	22				
5	313	29					131	35				
6	302	27					88	42				
7	274	22					101	42				
8	274	46					84	58				
9	252	77					48	67				
10	226	42					29	50				
11	227	17					28	43	76	337	76	261
12	243	23					27	44				
13	263	15					27	42				
14	283	14					30	35				
15	365	18					117	33				
16	425	25					84	37				
17	449	37					82	32				
18	471	35					50	46	63	269	63	206
19	458	35					29	25				
20	404	28					28	12				
21	374	14					20	10				
22	394	20					17	9				
23	409	47					117	1				1
24	382	46					116	1				1
25	340	35					90	2				2
26	316	28					86	1				1
27	288	20					85	2				2
28	288	47					62	2				2
29	296	82					60	1				1
30	206	29					33	1				1
31	228	22										
Total		1050						756				478
Total Ac. Ft.		2083						1500			552	948

IN THE DISTRICT COURT OF SEVIER COUNTY, STATE OF UTAH

RICHFIELD IRRIGATION CANAL COMPANY,)
 ANNABELLA IRRIGATION CANAL)
 COMPANY, ELSINORE CANAL COMPANY,)
 BROOKLYN CANAL COMPANY, MONROE)
 IRRIGATION COMPANY, WELLS IRRIGATION)
 COMPANY, JOSEPH IRRIGATION COMPANY,)
 ELSINORE BENCH IRRIGATION COMPANY)
 and SEVIER VALLEY CANAL COMPANY,)

Plaintiffs,)

-vs-)

DESERET IRRIGATION COMPANY, DELTA)
 CANAL COMPANY, MELVILLE IRRIGATION)
 COMPANY, ABRAHAM IRRIGATION COMPANY,)
 CENTRAL UTAH WATER COMPANY, SEVIER)
 BRIDGE RESERVOIR COMPANY and UTAH)
 STATE ENGINEER,)

Defendants.)

STIPULATION

Civil No. 5335

Come now Ken Chamberlain and Edward J. Clyde, Attorneys for the Plaintiffs; Thorpe Waddingham and Sam Cline, Attorneys for Defendants Deseret Irrigation Company, Delta Canal Company, Melville Irrigation Company, Abraham Irrigation Company, Central Utah Water Company, and Sevier Bridge Reservoir Company; and Dallin W. Jensen, Assistant Attorney General, Attorney for the Utah State Engineer, and mutually stipulate and agree as follows:

1. That further proceedings in the above captioned case may be allowed to pend without prejudice to the rights of the Plaintiffs or the Defendants to and including December 31, 1970, subject to the provisions hereinafter set forth.

2. That the "upper zone" of the Sevier River system, insofar as the rights of the parties to this Stipulation are concerned, may and shall be administered in accordance with a proposal made in the form of a Memorandum by Sevier River Commissioners Keith Christensen and W. Roger Walker, a copy of which is hereto annexed, marked Exhibit "A", and incorporated by reference as though set forth fully herein.

3. That administrative practices which may be at variance with Exhibit "A" may be allowed only on the prior approval in writing of all parties to this Stipulation, made after disclosure of all relevant or pertinent facts by the Sevier River Commissioners to all parties hereto.

4. That records kept under administration practices contemplated herein shall be reviewed annually by the parties. At the end of the irrigation season of 1970, or at any time prior to December 31, 1970, either the Plaintiffs or the Defendants may, in writing served in the manner required by the Utah Rules of Civil Procedure upon the other parties, rescind the method of administering the rights of the parties hereto as provided in this Stipulation and Exhibit "A", and no conduct, waiver, or forbearance in the otherwise timely prosecution or assertion of any defense of or in this action shall operate to prejudice any of the Plaintiffs' or Defendants' rights, and further, that in the event any party does so rescind this Stipulation, the rights of the parties hereto shall be administered in accordance with the Cox Decree, as interpreted by the present decisions of the Utah State Engineer which are subject to the pending Court action, until such time as such Court action is finally consummated.

5. That if the Plaintiffs have not, by a written notification provided for in Paragraph 4 hereinabove, withdrawn, repudiated or rescinded the method of administering the "upper zone" adopted by this Stipulation, then the same and the Memorandum hereto attached as Exhibit "A" shall be incorporated into a final decree and the "upper zone" of the Sevier River shall thereafter be administered in the manner and under the procedures specified in the attached Memorandum, Exhibit "A"

DATED this _____ day of June, A.D., 1968.

Ken Chamberlain

Edward W. Clyde
ATTORNEYS FOR PLAINTIFFS

Thorpe Waddingham

Same Cline

ATTORNEYS FOR DEFENDANTS
DESERT IRRIGATION CO., ET AL.

Dallin W. Jensen

ATTORNEY FOR DEFENDANT UTAH STATE
ENGINEER

REGULATION DAM

The Sevier River Commissioners were instructed to outline the basis of a regulation stream between Piute Reservoir and Vermillion Dam. The purpose would be to enable the River Commissioners to operate and deliver to the water users the water in the most efficient way possible and to minimize losses in the river distribution system.

We hereby submit the following for your consideration and suggestions:

REGULATION STREAM

1. A regulating stream would be defined as a stream released from Piute Reservoir in excess of the expected intake at the various diversions for the purpose of making adjustments of time, rate of flow, or compensate for regulating problems. It would be that specified quantity that passes over Vermillion Dam during the irrigation season when no water is due Sevier Bridge Reservoir from the upper zone. A regulating stream would be limited to that period of time between the dates of April 1 to October 1 of each year.
2. A regulatory stream passing over Vermillion Dam up to fifteen percent (15%) of the amount released at Piute would be sufficient. To allow time for adjustment in the rate of flow due to releases and accretions below Piute Reservoir, the regulatory stream would be calculated by averaging the average daily flow of any consecutive seven days. Any excess above the 15% would be allocated to the rights of Piute and Sevier Bridge Reservoirs.
3. That quantity defined as regulating water stored in Sevier Bridge would incur the same river losses as any other waters over Vermillion Dam. At the present time these losses are assessed as follows: Two (2%) percent from Vermillion Dam to Sevier River near Sigurd. Ten percent (10%) of the flow past Sigurd is deducted, giving net acre feet in Sevier Bridge Reservoir. After July 1 to October 1, when conditions warrant, twelve (12%) percent of the flow past Sigurd is deducted to give net acre feet in Sevier Bridge Reservoir.
4. Evaporation loss would be charged for the month which the water was delivered into Sevier Bridge Reservoir. The regulating water would stand its proportionate share of evaporation loss in conjunction with all the waters in Sevier Bridge Reservoir until October 1. From October 1 to April 1 the loss assigned all holdover water in Sevier Bridge is five (5%) percent. The quantity derived after taking river losses, evaporation loss, and holdover loss would then be withheld for the use of the A to L users from any water due Sevier Bridge from the upper zone in the following year or years. The regulating water would be held as long as necessary, and as long as capacity is available, to effect the exchange. The proportionate evaporation loss and holdover loss would be for as long as the water was in Sevier Bridge Reservoir.

EXHIBIT "A" -- REGULATION STREAM

The evaporation loss figures from a water surface now used in computing losses for Sevier Bridge Reservoir are: April - 3.7 inches, May - 6.0 inches, June - 8.5 inches, July - 11.2 inches, August - 10.6 inches, and September - 7.5 inches.

5. The regulating water would be subject to the same provisions as all other holdover water in Sevier Bridge Reservoir. In the event the Sevier Bridge Reservoir fills to its capacity of 236,145 acre feet all water becomes "common" and is re-allocated according to the provisions in the Cox Decree.

/s/ Keith B. Christensen
Keith B. Christensen

/s/ W. Roger Walker
W. Roger Walker

Sevier River Water Commissioners

EXPLANATION OF 1968 REGULATING STREAM

A summary for the year 1968 regarding the A-L Users Agreement with Consolidated Sevier Bridge Reservoir Company is here compiled by the River Commissioners. Included is a table of river and reservoir losses used in transporting and storing the water involved with this agreement.

The water involved in this agreement is calculated on a seven day total beginning with the first of each month. Odd days at the end of the month are grouped using a two or three day total. No days carry over into the next month. This procedure allows the records for each month to be closed at the end of that month.

All water involved in this agreement should be charged reservoir losses to the 1st of April of the next year. The amount charged will depend on which month is involved. If for any reason the water is not transferred on the 1st of April of each year it will be held over until the 1st of April of the following year and charged the yearly total of 17% storage loss.

The net regulating water of 3056 Ac.Ft., if capacity is available in Piute Reservoir, will be credited to the A-L Users out of the water due Sevier Bridge Reservoir that is impounded in Piute Reservoir as of April 1st of the following year. It is our recommendation that whenever possible the commissioners shall estimate the anticipated net regulating quantity of water that will flow into Sevier Bridge Reservoir, and hold back in Piute Reservoir for the A-L Users this water. This procedure would eliminate the mandatory evaporation losses of water held in Sevier Bridge Reservoir and make available for current use by the A-L Users the anticipated regulating water. Once the regulating stream is established there would be no loss of water available for current use to any users excepting the transmission losses of the regulating stream. This water would be deducted from A-L credits now accumulated. We note the following examples as further explanation--

1. The A-L Users have credits, with storage rights and holdover privileges, of 3056 Ac.Ft. of water in Sevier Bridge Reservoir. This water would otherwise have gone to make new storage water.
2. The computation shows that had the regulating stream been in effect during the high water period below Piute Reservoir, the weekly averaging of the 15% would have compensated for the fluctuating flow to the extent little or no primary water would have been lost to storage in this year.
3. Piute and Sevier Bridge Reservoirs will benefit by moving the storage water due Sevier Bridge earlier with less loss and by not retaining storage water for only regulating purposes.
4. Piute and Sevier Bridge Reservoirs as between themselves will have moved 3056 Ac.Ft. of water without river loss, giving a net gain to storage water when transferred up stream of 1015 Ac.Ft.

5. 3056 Ac.Ft. is added to the "call" system between Vermillion Dam and Sevier Bridge Reservoir.

6. Looking to the possible future additional new water to the Sevier River System the regulating stream can be the vehicle by which this water can be made available to the various users without changing the decreed rights.

STORAGE AND RIVER LOSSES USED IN TRANSPORTING AND STORING THE WATER INVOLVED IN THE A-L AGREEMENT WITH CONSOLIDATED SEVIER BRIDGE RESERVOIR COMPANY

STORAGE LOSSES

Holdover water	17%
Water made in April	15%
Water made in May	13%
Water made in June	11%
Water made in July	9%
Water made in August	7%
Water made in September	5%

Water stored in Sevier Bridge Reservoir shall be transfered on the 1st of April of each year. Water not transfered on the 1st of April of each year will be held over until the 1st of April of the next year and charged a yearly total of 17% storage loss.

RIVER LOSSES

Piute Reservoir to Vermillion Dam	15%
Vermillion Dam to Rocky Ford Dam	2%
Rocky Ford to Sevier Bridge Reservoir	10% to July 1 12% thereafter

Prepared by

BRUCE WHITED
ROGER WALKER

Sevier River Commissioners

ELSTON COMPANY, ILLIS IRRIGATION COMPANY, JOSEPH IRRIGATION COMPANY, BENCH IRRIGATION COMPANY, STIPULATION No. 5335

MONTHLY TOTALS FOR THE YEAR OF 1968, OF WATER INVOLVED IN THE A-L USERS
AGREEMENT WITH THE CONSOLIDATED SEVIER BRIDGE RESERVOIR COMPANY

JULY

Total at Vermillion Dam	2521 Ac.Ft.
Less storage due Sevier Bridge	1073 Ac.Ft.
Balance	<u>1448 Ac.Ft.</u>

A-L REGULATING WATER

Balance at beginning of month	0
A-L water at Vermillion Dam	1075 Ac.Ft.
Less 2%	<u>-22</u>
Net Rocky Ford Reservoir	1053 Ac.Ft.
Less 12%	<u>-126</u>
Net Sevier Bridge Reservoir	927 Ac.Ft.
Less storage to April 1 9%	<u>-83</u>
Net July Credit	844 Ac.Ft.

WATER GOING TO STORAGE

Over Vermillion Dam	534 Ac.Ft.
Less 2%	<u>-10</u>
Net Rocky Ford Reservoir	524 Ac.Ft.
Less 12%	<u>-62</u>
Net Sevier Bridge	462 Ac.Ft.
Less storage loss to April 1 9%	<u>-42</u>
Net July Credit	420 Ac.Ft.

AUGUST

Total at Vermillion Dam	1890 Ac.Ft.
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A-L REGULATING WATER

Balance at beginning of month	844 Ac.Ft.
A-L water at Vermillion Dam	1154 Ac.Ft.
Less transmission and Reservoir Losses	<u>-229</u>
Net Sevier Bridge April 1	925 Ac.Ft.

WATER GOING TO STORAGE

Balance	420 Ac.Ft.
Over Vermillion Dam	910 Ac.Ft.
Less transmission and Reservoir Losses	<u>-179</u>
Net August Credit	731 Ac.Ft.
Balance end of Month	1151 Ac.Ft.

SEPTEMBER

Total at Vermillion Dam	1571 Ac.Ft.
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A-L REGULATING WATER

Balance at beginning of month	1769 Ac.Ft.
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A-L water at Vermillion Dam	1571 Ac.Ft.
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Less transmission and Reservoir losses	<u>-284</u>
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Net Sevier Bridge April 1	1287 Ac.Ft.
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Balance end of month	3056 Ac.Ft.
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No water over Vermillion going to storage in September

WATER SUMMARY AS OF OCTOBER 1, 1974

I

CANAL SUMMARY

otter Creek Credits
~~Canal A-L~~

	Credit	Holdover Res. Loss	Approx. A-L Reg Credit	Est. Credit April 1, 1975
Annabella	1236	309	612	1539
Joseph	891	222	521	1190
Brooklyn	821	205	597	1213
Elsinore	907	226	380	1061
Sevier Valley	2101	525	103	1679
Richfield	3648	912	1729	4465
Monroe	- 33	0	964	931
<i>Monroe</i> South Bend	1329	332	25	1022
Wells	1010	252	219	977
Vermillion	-1139	0	761	-378
Total A-L	10,771	2,983	5,911	13,699
Piute	13,854	831	0	13,023
Total Holdover	24,625	3,814	5,911	26,722

RESERVOIR SUMMARY

Reservoirs	g. H	Contents
Piute Oct. 1	33.8	5,350
Otter Creek Oct. 1	19.1	18,120
Total		23,450
S. Bridge A-L Reg. Stream Est.		7,085
Upper and Lower Total Holdover		30,536
- Winter Losses		3,814
		26,722

Bruce White